

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

INTERNATIONAL WATCHMAN INC.,

Plaintiff,

vs.

REEDS JEWELERS, INC., ET AL.,

Defendants.

CIVIL ACTION NO. 1:23-CV-2396

JUDGE DAVID A. RUIZ

**MAGISTRATE JENNIFER D.
ARMSTRONG**

**DECLARATION OF WILLIAM D. REINGER IN SUPPORT OF DEFENDANT REEDS
JEWELERS, INC.'S MOTION TO DISMISS**

I, William D. Reinger, declare as follows:

1. I am currently the Chief Finance Officer at Reeds Jewelers, Inc. ("Reeds"). I have been employed by Reeds for more than 20 years. I currently reside and work in Wilmington, North Carolina.

2. I submit this Declaration in support of Reeds' Motion to Dismiss. The facts stated herein are true based on my own personal knowledge or knowledge obtained through my employment at Reeds, conversations with Reeds colleagues, and my review of records maintained in the ordinary course of business by Reeds. If called upon to testify, I could and would testify competently thereto.

3. Reeds is incorporated under the laws of North Carolina with its headquarters and principal place of business located at 2525 S. Seventeenth Street, Wilmington, North Carolina 28401.

4. Reeds does not have offices, facilities, operations, or retail stores in Ohio.

5. Reeds does not have any agents, officers, or directors in Ohio.

6. Reeds has one remote employee who chooses to live in Ohio for personal reasons. That employee has no responsibility for the products at issue in this case.

7. Reeds does not have any real property, inventory, or bank accounts located in Ohio.

8. Reeds has retail locations in only the following states: Alabama, Florida, Georgia, Kentucky, Maryland, Mississippi, North Carolina, Pennsylvania, South Carolina, Tennessee, Texas, Virginia, and West Virginia.

9. The majority of Reeds' business is conducted through its brick and mortar retail locations, of which there are none in Ohio.

10. Reeds also conducts business through its website, www.reeds.com, which is generally available to people with internet access. Reeds does not conduct business from any website other than its own, www.reeds.com.

11. Reeds' website is controlled from North Carolina by Reeds' employees there.

12. Reeds' website was not created and is not operated with the purposeful intent of specifically reaching internet users in Ohio.

13. Reeds does not target its advertising specifically at Ohio. Reeds uses Google and other online advertising platforms which, on information and belief, may take into account a user's location, but Reeds has no control over that and does not do anything to target Ohio residents in its advertising.

14. Among many other products, Reeds sells watches and watch accessories, like watch straps. Reeds sells NATO-style watches and watch straps manufactured by multiple companies, including Hamilton, Bulova, and Omega. ("NATO-style Products").

15. Between 2020-2023, Reeds had only one sale of NATO-style Products shipped to Ohio, generating \$296.25 in revenue. Ohio accounts for less than 0.2% of Reeds' total sales of NATO-style Products for 2020-2023. I have no reason to believe that the sales data for Reeds' sales of NATO-style products before 2020 is dissimilar to that for 2020-2023.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 11, 2024 in Wilmington, North Carolina.

/s/ William D. Reinger

William D. Reinger